

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

HARBOR HEALTHCARE SYSTEM,)	CASE NO.:	_____
)		
)		
Plaintiff,)		
)		
v.)		
)		
)		
UNITED STATES OF AMERICA,)		
)		
Defendant.)		

**MOTION FOR LEAVE TO FILE MOTION FOR RETURN OF
PROPERTY AND JUDICIAL INTERVENTION UNDER SEAL**

Harbor Healthcare System, L.P. (“HHCS”), by and through its undersigned counsel respectfully requests this Court enter an Order permitting it Motion for Return of Property and Judicial Intervention (the “Motion”) to be filed under seal. The Motion should be sealed in the interest of justice because it concerns the execution of a search warrant in an ongoing criminal investigation. Additionally, the Motion and the exhibits thereto contain confidential business information that should not be made public.

For the foregoing reasons, HHCS respectfully requests this Court enter an Order permitting the Motion, the Memorandum in Support, and its exhibits to be filed under seal.

Respectfully submitted,

/s/ Edmund W. Searby
Edmund W. Searby * (OH. 0067455)
Searby LLP
Suite 210N
30195 Chagrin Blvd.
Cleveland, Ohio 44124
Tel: (216) 591-2613
esearby@searby.law

Gregory S. Saikin
Texas Bar No. 24051281
SDTX No. 3099089
Samuel E. Doran
Texas Bar No. 24095762
SDTX No. 2639082
Baker Hostetler LLP
811 Main Street, Suite 1100
Houston, Texas 77002
Tel: (713) 646-1399
gsaikin@bakerlaw.com
sdoran@bakerlaw.com

* Not admitted to the Southern District of Texas; motion for Pro Hac Vice to be filed following this motion.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 7, 2018, the foregoing document was filed electronically via the Court's electronic filing system pursuant to Local Rule 5.1.

/s/ Samuel E. Doran